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ABSTRACT

This guide is designed to assist adult education cooperatives in implementing educational services for recipients of Aid to Families with Dependent Children participating in the Job Opportunities and Basic Skills (JOBS) program. It addresses the educational services to be provided by the cooperatives per the interagency cooperation contract entered into by the Texas Department of Human Services and Texas Education Agency. The guide amplifies the responsibilities of the adult education cooperative system in the delivery of educational services to JOBS participants. Recommendations are made for implementing the educational programs in a successful and cost-effective manner. These areas are covered: the referral process, academic assessment, instructional delivery, educational activities, ancillary services, attendance verification, and location and coordination. The fiscal policies governing program administration are then clarified. Funding restrictions, quarterly and final reimbursements, and program accountability are discussed. Appendixes include a JOBS education service provider referral form and JOBS weekly attendance verification form. (YLB)

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Operational Guidelines for
Adult Education Programs
Serving JOBS Participants



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FOREWORD

This guide has been prepared to assist adult education cooperatives in implementing educational services for recipients of Aid to Families With Dependent Children (AFDC) participating in the Job Opportunities and Basic Skills (JOBS) program. This document is intended to serve as a guide for implementation of appropriate educational services for which the 71st legislature has appropriated funds to be used to expand education and training services to AFDC recipients. These services are offered in response to the interagency contract with the Texas Department of Human Services (TDHS) pursuant to Section 485(a) of the Family Support Act of 1988.

The partnership between TDHS and the Texas Education Agency (TEA) is intended to decrease administrative barriers to serving AFDC/JOBS participants and to increase clients' access to educational services through interagency planning, coordination, funding, and service delivery. This partnership provides the adult education system with access to additional federal matching funds for educational program implementation. Statewide delivery of educational services to JOBS participants will be through the adult education cooperative system in counties identified as JOBS counties.

This guide addresses the educational services to be provided by the adult education cooperatives as per the interagency cooperation contract entered into by TDHS and TEA and effective October 1, 1990. In response to the contractual agreement, this guide amplifies the terms of the contract, specifically the responsibilities of the adult education cooperative system in the delivery of educational services to JOBS participants. Included are recommendations for implementing the educational programs in a successful and cost effective manner as well as clarification of the fiscal policies governing program administration.

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THE JOB OPPORTUNITIES AND BASIC SKILLS TRAINING PROGRAM

With the passage of the Family Support Act of 1988, federal legislation has created the Job Opportunities and Basic Skills Training program, commonly referred to as JOBS, to assist recipients of Aid to Families with Dependent Children. This legislation is designed to provide recipients of Aid to Families with Dependent Children with needed employment-related activities and support services that will help them escape poverty and achieve economic self-sufficiency.

Key among the partnerships formed to implement the Texas JOBS program is the one between the welfare community and education. The Family Support Act clearly recognizes education as a central element in helping families avoid long-term dependence on public assistance. In a marked departure from earlier welfare-to-work programs, the Family Support Act requires states to make educational services available to participants under its new JOBS program and provides federal matching funds to assist in these efforts.

The adult education system in the state of Texas is called upon to be a primary provider of educational services to recipients of Aid to Families With Dependent Children (hereafter referred to as AFDC). Specifically, many AFDC recipients participating in the Texas JOBS program are those who have achieved less than a high school education and who require upgrading of their basic academic skills in order to qualify for job training and job placement.

Targeted Populations

Participants in the Texas JOBS program include the following targeted populations:

- individuals receiving AFDC benefits for at least 36 of the preceding 60 months;
- individuals who are custodial parents under age 24 without a high school education, and at the time of application for AFDC are not enrolled in high school or in a high school equivalency course of instruction, and who have had little or no work experience in the previous year;
- members of families in which the youngest child is within 2 years of being ineligible for AFDC benefits (16 years or older);
- AFDC youth ages 16 and 17 who are not in school; and
- AFDC Unemployed Parent (UP) recipients in two-parent households.

The Texas Department of Human Services uses three service levels to classify JOBS participants, based on the extent of their needs. Adult education cooperatives may be asked to serve JOBS participants from all three service levels, which are described below.

- Service Level I participants have a recent work history, a high school diploma or its equivalent, or have completed job skills training; most of these participants are referred to employment services contractors with employment anticipated within a six month period.
- Service Level II participants receive full case management services; they require extensive support services, education, or training planned and coordinated by case management personnel.

- Service Level III participants usually have multiple barriers which prevent immediate employment; they are likely to have limited or no work history and no vocational or skills training; they receive information and referral to education, training, and social service providers to address long term needs, but they may not receive full case management services.

JOBS Components

The state's JOBS program must include the following four services and activities:

- an education activity below the post secondary level deemed appropriate to the participant's employment goal;
- job skills training in a specific occupational area;
- job readiness activities that ensure familiarity with general workplace expectations as well as work behavior and attitudes necessary to compete successfully in the labor market; and
- job development and job placement activities.

The Family Support Act sets two specific requirements for program implementation. First, educational activities offered must include high school education or its equivalent, basic and remedial education to achieve a basic literacy level of a minimum 8.9 grade level, and education for individuals with limited English proficiency. Second, JOBS activities must be measured in terms of a 20 hour per week standard. To achieve the 20 hour per week standard, a combination of educational and other JOBS components is allowed.

STATEMENT OF SERVICES TO BE DELIVERED

The terms of the interagency cooperation contract between the Texas Department of Human Services (hereafter referred to as TDHS) and the Texas Education Agency (hereafter referred to as TEA) specify the delivery of four kinds of educational services. The contracting parties agree to provide educational services for clients at the level needed and to ensure that attendance information is available to meet federal reporting requirements. The following section is taken directly from the contract.

The Performing Agency (TEA) will provide educational services through a system of adult education cooperatives to recipients of Aid to Families with Dependent Children (AFDC) who have been identified by the Texas Department of Human Services as participants in the Job Opportunities and Basic Skills Training (JOBS) program and who have been referred for such services through the mutually agreed upon JOBS education service provider referral form. The specific educational services to be provided are as follows:

- individual academic assessment to determine the educational service level of each JOBS participant enrolled;
- adult basic and remedial instruction necessary for a JOBS participant to achieve a literacy level consistent with the participant's employability plan;

- adult secondary instruction and/or GED preparation necessary for a JOBS participant to achieve a literacy level consistent with the participant's employability plan; and
- instruction in English as a Second Language (ESL) where assessment indicates that English language training is necessary for the JOBS participant to meet the objectives of the participant's employability plan.

Ancillary educational services such as life coping skills, pre-vocational planning, job readiness training, and other forms of pre-employment preparation may be provided by adult education cooperatives where such services are a standard part of their educational program.

Educational services for JOBS participants will be provided by adult education cooperatives currently serving those Texas counties implementing the JOBS program to the extent that funds are available. Services will be provided on a first-come-first-served basis to JOBS participants who are over the age of compulsory school attendance and who have been referred by TDHS. For individuals not enrolled in adult education programs, cooperatives will serve as a safety net by assisting case managers in providing resource information for referring clients to other service providers, where available.

IMPLEMENTATION OF INSTRUCTIONAL SERVICES

The partnership with TDHS offers adult educators the opportunity to demonstrate the responsiveness, efficiency, and collaborative ability of the statewide cooperative system by serving all referred JOBS participants, regardless of learners' instructional levels or limited English proficiency.

The Referral Process

Educational services begin with the referral of JOBS participants to an adult education cooperative. The terms of the interagency contract provide specifics about the referral process. JOBS participants in need of educational services provided by the adult education cooperative will be referred to the cooperative by TDHS using the *JOBS Education Service Provider Referral* form (TDHS Form 2735 - see Appendix A). Contractual responsibilities begin upon enrollment of the JOBS participant with the adult education cooperative and cease when the educational component or components have been completed or when the client can no longer be satisfactorily served.

The Referring Agency (TDHS)

The top portion of the *JOBS Education Service Provider Referral* form is completed and signed by the individual making the referral. In most instances, this will be a Client Self Support (CSS) staff member or case manager whose responsibility it is to manage - to varying degrees of intensity, depending upon the client's service level - the JOBS participant's case. It is the task of CSS case management to identify the JOBS participant's needs. CSS staff are responsible for planning and coordinating support services and JOBS components, which may include education, job skills training, job readiness activities, and job development or job placement. It is the CSS case manager who ideally commands the most comprehensive understanding of the JOBS participant's overall needs as well as any existing obstacles to self-sufficiency. CSS staff are the first of several crucial links in the case management-client-education provider relationship. It is therefore paramount that efforts be made to establish and maintain effective

channels of communication between TDHS staff members making referrals and the adult education cooperative providing educational services.

Note: Employment service contractors or other service providers may also refer JOBS participants to adult education cooperatives. For example, an employment service contractor, serving as a participant's case manager, may find that a Service Level I participant who has work experience or job skills training lacks a high school diploma. In such a case, the employment service contractor might refer the participant to a GED class in an adult education cooperative. The referral process is the same: TDHS Form 2735 should identify the student as a JOBS participant and provide documentation of the referral.

The ***JOBS Education Service Provider Referral*** form is an efficient means of transmitting to the adult education cooperative pertinent information about the JOBS participant, including Adult Basic Learning Examination (ABLE) screening scores, whether the JOBS participant has attended the Survival Skills for Women workshop series prior to referral to the education service provider, and comments about specific academic needs and interests. As per the interagency contract, the referral form is the **mutually agreed upon means of documentation** of referral and enrollment in an adult education cooperative program.

The referral form is a four-part form. One copy remains in the participant's case record, and the participant receives one copy. A Client Self Support staff member sends the original and one copy to the adult education cooperative prior to the participant's enrollment in an educational program.

The Service Provider (Adult Education Cooperative)

Reporting procedures for adult education require differentiation among the four kinds of educational services to JOBS participants. Two-digit codes identify the educational activities, as defined by federal regulations, in which participants are enrolled.

Code 01 - Beginning Adult Basic Education (grade levels 0-5.9)

Code 02 - Intermediate Adult Basic Education (grade levels 6-8.9)

Code 03 - Adult Secondary Education / GED (grade levels 9-12.9)

Code 04 - English as a Second Language (all levels ESL)

The information provided on the referral form may not be adequate to identify a participant's academic proficiencies and needs. Adult education cooperative personnel are responsible for accurately and consistently identifying JOBS participants as enrolled in one of these four activities. **Placement** in one of these educational activities and identification by the corresponding code is to be determined by **initial assessment**.

After a JOBS participant has been referred to an adult education cooperative and the participant's academic needs have been identified, the instructor or a designated cooperative representative determines whether the individual can be served and completes the lower portion of the referral form, using the two-digit code to indicate the participant's enrollment in the appropriate educational activity. Cooperative personnel must also provide the enrollment date or the reason for not enrolling the participant (for example, no class available or client did not show), a telephone number for the class site, and both the printed name and signature of the instructor. The comments section provides space for conveying

pertinent information to case management personnel, such as assessment results, observations made during initial assessment or class meetings that suggest possible learning difficulties, scheduling problems and changes, or needed support services. A cooperative representative returns a copy of the completed referral form to TDHS and keeps the original.

The ***JOBS Education Service Provider Referral*** form documents the referral and enrollment in an adult education cooperative program, and provides verification for reimbursement. In addition, the information completed by cooperative personnel and sent to the referring entity provides vital tracking data. The form also provides an efficient and effective means of initiating and documenting communication efforts by adult education personnel in regard to JOBS participants' status. Thus, its completion and retention are essential.

Academic Assessment

The interagency contract specifies that adult education cooperatives will provide individual academic assessment to determine the educational service level of each JOBS participant enrolled. While the Family Support Act provides the state with maximum flexibility to design programs that meet local needs, regulations emphasize the need for the use of assessment instruments that accurately and consistently measure JOBS participants' performance and proficiency. The Act does not advocate the use of an assessment instrument independent of instructor observation and participant mastery of individual components. Rather, it suggests that progress be measured through a sequence of learning objectives, related curriculum, and pre-assessment and post-assessment, providing a composite system of measure.

As per the terms of the contractual agreement, comprehensive assessment takes on added importance in serving JOBS participants for two reasons:

- the time constraints imposed in serving this population necessitate attention to efficient and effective use of instructional time; and
- many of the employment training programs for which these participants may eventually qualify require a minimum skill level.

Therefore, it is paramount that initial and periodic assessment identify and measure student needs and progress. Identification of JOBS participants' academic proficiencies and educational needs may be accomplished through the administration of any one or a combination of assessment options. However, any assessment option should be selected with regard to the specific competencies or skills needing to be assessed. If, for example, assessment in the area of writing paragraphs, letters, or other expository documents is needed, the most logical assessment option would be ratings of actual written performance.

The fundamental, guiding principle in selecting appropriate assessment instruments is the matching of instrument with purpose. Although placement is often accomplished through the use of a standardized, norm-referenced test, this procedure may not be necessary or the most advantageous. Placement into a program may be better achieved through an interview with a student, with samples of reading and writing achievement, and performance samples. Assessment of progress may be determined in similar ways or combined with a standardized, norm-referenced achievement test. Adult educators hold to the tenet that adult learners should be involved in their own assessment as much as possible, particularly in providing feedback and interpretation of assessment results.

As important as selecting the most accurate means of assessment is the **timeliness and length of the assessment**. For adult learners who have been out of school for many years and for whom formal education and testing have been unsuccessful experiences, care must be taken to ensure that assessment results truly reflect the learners' proficiencies and needs rather than their anxieties and an absence of test wiseness.

An Integrated Approach to Assessment

Different assessment instruments use different criteria and evaluation procedures; therefore, they often assess different skills. Each has a limited and specific purpose that can not be compared with that of other instruments. In assessing JOBS participants, what is needed is an **integrated approach to assessment**. A combination of traditional and nontraditional assessment options provides greater accuracy in identifying learner proficiencies, is learner centered, and is potentially unobtrusive when administered correctly. The integrated approach to assessment also allows for added flexibility in meeting JOBS participants' needs for initial as well as ongoing assessment.

Initial assessment for a JOBS participant serves the following purposes:

- to identify the participant's level of competence;
- to place the student in the appropriate level of program (beginning ABE, intermediate ABE, GED, or ESL);
- to communicate to the JOBS participant's case manager the educational activity in which the participant is to be enrolled; and
- to assist both the participant and case management personnel in developing realistic expectations about what the participant can accomplish academically within a given period of time.

Initial assessment is usually more accurate when accomplished through the use of a combination of options. Oral interviews, writing samples, informal reading inventories, standardized criterion-referenced instruments that identify a grade level equivalency, and curriculum-based placement tests are examples of effective options available for initial assessment of a student's academic proficiencies and needs. Initial assessment should provide adult educators with comprehensive information regarding student competencies, appropriate placement in an educational activity, and realistic expectations of what the student might accomplish.

Ongoing assessment for JOBS participants serves four purposes:

- to demonstrate progress within a proficiency level or from one level to another;
- to identify students who are prepared to progress to a higher level or to attempt a specific task or test;
- to communicate to case management personnel information about academic progress, or lack thereof, that may have a significant impact on AFDC clients' participation in the JOBS program; and
- to provide JOBS participants with regular feedback about academic expectations and performance.

Effective assessment options that provide a comprehensive profile of student progress include work samples in student portfolios, progress checklists, teacher observations, and mastery exercises or tests indicating successful completion of units of study. Again, the fundamental, guiding principle in selecting appropriate assessment instruments is the **matching of instrument with purpose**. An integrated approach to assessment that integrates nontraditional with traditional assessment options ensures greater accuracy in determining adult learners' needs.

Nontraditional Assessment

Two characteristics of nontraditional forms of assessment are that they are learner-centered and relatively unobtrusive. They have high face validity in that they directly assess what they are intended to assess. They also lend themselves to curriculum-based approaches, especially when the curriculum is dynamic and changing, contingent upon student needs and ongoing input. These assessment options allow for diagnostic feedback pertaining to the student's performance without distracting, frustrating, and delaying the adult learner.

The primary difficulty with these measures, however, is their inconsistent reliability. Results often vary depending on the examiner and the situation. Compilation and summarization of results are labor-intensive and require teacher training to be used effectively. But these same criticisms often hold true for traditional forms of assessment. Adult educators must consider nontraditional forms of assessment to obtain the most accurate measure of the adult learner's skills and educational needs. Following are four examples of highly effective nontraditional assessment options.

Interviews consist of a series of questions or directives that elicit oral or written responses. Possible topics include reasons for entering the educational program, previous educational experience, cultural background, interests, and personal expectations. Interviews conducted by the instructor or by the participants themselves throughout the instructional experience can also provide ample speech samples for rating verbal fluency, plus a rich body of information about students' interests, needs, and perceptions of progress.

Ratings of student performance in speech production, writing samples, oral reading, and other learning situations that produce observable behavior are considered valid indicators of progress or mastery. For example, the holistic rating of free speech for ESL students could be measured on a four-point scale:

- 0 - no oral production
- 1 - isolated words only (yes or no, labels for objects)
- 2 - simple sentences, occasional errors ("I go to the store.")
- 3 - articulate, native-like production ("I think I'll go to the store.")

Another example of holistic rating is the ranking scale used to rate student writing samples. By identifying specific characteristics inherent to acceptable writing samples and by attending to the overall effectiveness of the writer in communicating his or her thoughts, instructors can refine their ability to instruct participants in the process of writing. For example, the GED Essay Scoring Guide can be used to define and evaluate the characteristics exhibited in writing samples, regardless of the topics. The scoring guide describes the characteristics of papers written by a sample group of high school seniors and rates quality on a six-point scale. While this scoring system may not be appropriate for rating the writing proficiency

levels of adult basic education and limited English proficient students, it may serve as a model for the development of other appropriate scales. Generally, student writing samples will have some or all of the following characteristics described in the GED Essay Scoring Guide:

- Upper half papers (scores of 4-6) make clear a definite purpose, pursued with varying degrees of effectiveness. They also have a structure that shows evidence of some deliberate planning. The writer's control of the written language, including the conventions of standard written English (spelling, punctuation, grammar, word choice, and sentence structure) ranges from fairly reliable at 4 to confident and accomplished at 6.
- Lower half papers (scores of 1-3) either fail to convey a purpose sufficiently or lack one entirely. They include weaknesses and errors in conventions of standard written English that interfere with the effectiveness of the writing. Consequently, the writer's control of the written language ranges from rudimentary at 3, to random at 2, to absent at 1.

Other examples of assessment options that use rating scales are informal reading inventories and self-ratings of skills or changes in skills. Additional information about holistic scoring can be found in the Texas Education Agency's publication, **Empowering Adult Students to Write**, available in late summer of 1991, through the Division of Adult and Community Education Program Development.

Student portfolios are a third highly effective example of nontraditional assessment. Collections of student work as well as lists of readings or tasks completed provide an overview of a student's academic development across the length of a course of study. A prime example is a collection of writing or mathematics samples that shows the chronology of skill mastery and possible indicators of handicapping conditions such as learning disabilities. Portfolios can also include teacher observations of student behavior, indicating progress and mastery of targeted skills as well as demonstration of competencies.

Performance Samples include analysis and discussion of shared experiences, class presentations, oral readings, and community activities. These may be rated on a holistic scale, as described earlier, or simply discussed and evaluated in natural language terms with the student.

Traditional Forms of Assessment

Historically, standardized assessment instruments have been the most common form of assessment used to place students and to measure their progress in educational programs. The tests are administered under standard conditions, with everyone taking the same test. This allows for comparisons between individuals or between groups of individuals. Resulting scores should reflect the skills being assessed. Two advantages of using standardized tests are their validity and reliability. They are valid to the degree that they measure what it is they are designed to measure. They are reliable to the degree that they produce stable results, generally indicated by test and retest correlations. However, educators using standardized instruments must ensure cautious, appropriate administration of these instruments to minimize the risk of mismeasuring learners' proficiencies. Four kinds of standardized assessment instruments are commonly used.

Norm-referenced tests compare an individual's response to how a reference group, or norm population, responded to the same test. This kind of test is best known since most commercially prepared tests are of this kind. The Adult Basic Learning Examination (ABLE), the Test of Adult Basic Education (TABE), the Basic English Skills Test (BEST), and the Tests of General Educational Development (GED) are examples of widely used norm-referenced tests.

Criterion-referenced tests indicate the degree of mastery of pre-set criteria usually expressed as the percentage of items correct or the percentage of objectives mastered. The learner's score is compared to a standard such as 80, 90, or 100 percent of a domain of skill. Criterion-referenced tests are probably the second-best known kind of standardized test. Most commercially prepared text-based tests are criterion-referenced.

Competency-based tests reflect instructional programs designed specifically to develop certain competencies that are usually dictated by the demands of a job or other placement desired by the student. Either criterion-referenced or norm-referenced tests may be used as competency-based instruments, depending on how competencies are defined. The Adult Performance Level Project (APL) is one of the best known examples of this kind of test.

Curriculum-based tests indicate a program based on a curriculum, whether pre-set or dynamically developed with student input. This approach uses tests which are developed from the curriculum to determine if what is being taught is being learned. The Side by Side ESL materials are accompanied by curriculum-based tests.

In assessing the skills of adult learners, care must be taken to ensure that the assessment situation is one in which adult learners' skills, proficiencies, and educational needs are accurately identified. Assessment environments are complex, interpersonal places. Assessment is virtually never a detached, totally scientific, objective laboratory act. There are many key contributors to the assessment process and environment. In selecting assessment instruments, adult educators may find the following set of questions useful:

- What are the achievement targets that we want to measure?
- Why do we assess and who uses the assessment information?
- How do we measure student achievement?
- What are the pitfalls of assessment? What can cause us to mismeasure?
- What can we do to prevent mismeasure and to achieve accurate assessment?
- What do we mean by quality assessment?

Again, an integrated, multi-faceted assessment package that employs both traditional and nontraditional assessment options ensures the highest degree of accuracy in identifying learner proficiencies, is learner centered, and is potentially unobtrusive when administered correctly.

Instructional Delivery

Because education has not previously been a priority for many JOBS participants, the benefits of a better education are not always obvious to them. Therefore, an important responsibility of an adult educator is to demonstrate to JOBS participants that education is desirable, attainable, and a forerunner to success. Consequently, an adult educator's goal is to deliver an instructional program that integrates the acquisition of basic skills and life coping skills with transfer and application of learned skills across the educational spectrum.

How the participant perceives the educational process is crucial to successful participation. If educational opportunities are to have a significant impact upon an individual's life, it is important that instruction be delivered in such a way that the JOBS participant understands and perceives the value of the personal investment required. The responsibility for instructional delivery lies with the instructor. It is not the responsibility of the student to adapt to fixed teaching methods and materials; rather, it is the educator's responsibility to achieve the flexibility needed to meet the individual's needs. To ensure the most efficient and effective use of instructional time and to ensure that the learner's needs drive the curriculum, instructional delivery should include the following features:

- student involvement in the planning process;
- personalized study plans;
- information presented in manageable chunks to accelerate mastery;
- frequent and regular feedback;
- clear expectations about performance and attendance; and
- varied and interactive methodologies that allow for various learning styles.

The inclusion of these features in instructional delivery encourages a dynamic educational process in which motivation, student investment, and academic success are driving forces. Each of these features is discussed in greater depth on the pages that follow.

Student Involvement in the Planning Process

JOBS participants who actively participate in the education and training process are most likely to be successful. Involvement reinforces several important life coping skills:

- refinement of the learner's decision-making skills;
- acceptance of responsibility for the learning that needs to occur;
- ability to set goals and make periodic adjustments; and
- experience in self-evaluation.

As adult education serves growing numbers of non-voluntary adult learners whose participation in educational activities may be the result of one of several mandates, it becomes increasingly necessary for adult educators to help these learners realize the value of education. Adult learners may underestimate the depth of the commitment required and the benefits of a better education. By drawing these individuals into the instructional planning process, educators reinforce life planning skills essential to self-sufficiency. Following are examples of how students may become active participants in the planning process:

- oral interviews between instructors and new students;
- discussion of assessment results between instructors and students;
- alternate classroom activities from which the learner can select;
- periodic and collaborative review of the student's progress and discussion of a growth plan;
- practice in time management and priority setting; and
- class and group decision-making about class activities.

Personalized Study Plans

Personalized study plans and student involvement in the planning process go hand in hand. Early assessment of JOBS participants' basic skills and personalized study plans improve the likelihood of success. To develop a personalized study plan for each JOBS participant, specific components should be included:

- accurate assessment of the learner's academic proficiencies and needs;
- consideration of the learner's educational and training goals, time constraints, whether the student's studies should follow a particular sequence, and the number of hours of instruction offered; and
- a commitment to continuous and consistent monitoring of student progress in addition to the need to plan for, expedite, and ensure student success.

A valuable by-product of incorporating the personalized study plan into instructional delivery is a student file that includes student demographic data, assessment information, samples of student work, a record of student accomplishments, evaluations, and descriptions of the necessary adjustments to the course of study. Students can maintain their own files once the instructor has established a format. This file should be developed with the student and be accessible to the student for continuous self-evaluation of progress.

In developing a personalized study plan, the instructor must address the JOBS participant's educational goals and needs as well as the strengths upon which both student and instructor can capitalize. Together, the instructor and the participant discuss and determine the individual's need for teacher-directed instruction and self-directed learning activities. Educators who use personalized study plans are willing to invest the time necessary to design a format and to teach students to use this format because it frees the instructor from having to guide the student's every step and encourages the student to take more initiative in the learning process.

Instruction Presented in Manageable Chunks to Allow for Mastery

The student's ability to perceive academic success as manageable and attainable can have a significant impact on both attendance and the level of participation in an educational activity. The incremental management of instructional delivery is critical in providing educational opportunities for JOBS participants' success and should include as many of the following characteristics as possible:

- learning experiences that are positive;
- small successes that occur early and on a regular basis;

- participation that builds self-esteem and confidence;
- collaboration that forges a bond of trust and partnership; and
- evaluations that nurture a "can do" attitude.

Field personnel experienced in working with AFDC clients report characteristic dependency and lack of confidence among JOBS participants. Many have no idea of their potential. Some are withdrawn or defensive. Some see the instructor not as an ally in the learning process but as a suspect authority figure. For many, past educational experiences have been less than favorable; consequently, expectations of failure are already operative. In managing instructional delivery, several practices have proven highly effective in serving JOBS participants.

- Students receive small, manageable assignments that can be completed in reasonable periods of time.
- Students check their own work and the instructor monitors the results.
- Students complete their work, with the instructor observing and providing assistance when necessary so that errors are understood and not repeated.
- The instructor personalizes the size of student assignments to meet individual learning styles and coping skills.
- The instructor assists students in learning to manage study time.
- The instructor helps students set realistic goals that can be accomplished within a fixed time period.
- The instructor administers regular and periodic mastery exercises that enable the students to measure their own accomplishments, thereby providing them with experience in closure and the assurance that they are ready to move on in their studies.

Regular and Frequent Feedback

This fourth feature of instructional delivery has a significant impact on student retention and student success. Regular and frequent feedback eliminates the element of surprise in the evaluation of student progress. Adult learners consistently need to know how they are doing. **Assessment alone** cannot provide sufficient feedback to the student. Adult education instructors have identified a number of practices they find effective in providing feedback to students.

- Assign mastery exercises at regular and frequent intervals rather than administer tests that cover large segments of instructional material.
- Periodically complete a checklist with the student to verify mastery of specific learner outcomes and to identify others that require additional attention.
- Schedule periodic mini-conferences with students to evaluate academic progress.

- Complete periodic reviews of the student's portfolio, providing both student and instructor with a quick and easy means of identifying gaps in student work and the need for adjustments in the study plan.

Clear Expectations About Student Performance and Attendance

Adult educators have verified the need to clarify and reinforce expectations regarding academic performance and attendance for a growing number of non-voluntary adult learners such as the JOBS participants. Allowing students to come and go or to set their own attendance patterns is not usually effective when serving JOBS participants. Some reasons follow.

- Attendance for many JOBS participants is mandatory rather than optional.
- Time constraints are usually involved in serving JOBS participants.
- Limited previous positive educational experiences exist for participants to use as points of reference.
- Many do not understand the depth of commitment required to succeed academically.
- The more time that elapses between class meetings, the less likely the participants are to be successful in their studies.
- Many require extensive remediation and often face multiple mini-crises and obstacles to success.

JOBS participants often need assistance in understanding that their level of accomplishment is contingent upon their individual commitment as well as upon the instruction offered. Because most adults do better when they know what is expected of them, clearly defined expectations about performance and attendance can help strengthen participants' commitment. Instructors in the field have suggested a number of ways to provide definition, some of which are listed below.

- Involve the student in the planning process and development of a personalized study plan. This helps the student to understand that satisfactory performance and success are expected.
- Use regular and frequent feedback about the student's performance to signal expected learner outcomes. The use of checklists and discussion with the learner about mastery exercises and assessment results help draw the learner into the evaluation and instructional planning process.
- Because of the requirement to have JOBS participants enrolled in JOBS activities for a minimum of twenty hours per week, make sure participants are aware of the the total number of instructional hours available to them, and stress the importance of attending as many hours of instruction as possible.
- Schedule some time each week to address participants' affective and personal needs and concerns. The many obstacles and mini-crises encountered by these individuals can seriously impede their participation in the learning process. Guest speakers, videos and films, special

readings, and guided discussion may assist them in finding solutions or options that can minimize the adverse effects of these obstacles.

Varied, Interactive Methodologies

The methodologies used to deliver instruction take on greater significance when considering the many learning styles of adult learners. Variety in instructional activities tends to heighten students' ability to concentrate and to generate enthusiasm for their studies. Today's adult education programs require more variety as the population served becomes more diversified.

- Variety in teaching methodologies means that there is something for everyone in teacher-guided, whole class, small group, and self-directed instructional activities.
- Varied methodologies can draw out the quiet student or the passive individual who finds it difficult to participate in one or the other kind of class activity.
- Variety can provide comfort and safety to those who fear evaluation or the thought of being singled out or left on their own.
- Varied methodologies allow for participants' differences in goals, attitudes, and values.
- Varied approaches to instruction allow students opportunities to build self-confidence and to demonstrate acquired skills.
- A good mixture of methodologies allows the adult education instructor to interact with as many students as possible and as frequently as possible. The majority of adult learners consistently identify **interaction with the instructor** as one of the most powerful motivating factors in continuation of their studies.
- Varied instructional methodologies, when used consistently in the classroom, can assist students in understanding what is expected of them as well as what they can expect to happen in the instructional setting.

Both mathematics and writing lend themselves especially well to varied, interactive methodologies. In turn, varied, interactive methodologies used in mathematics and writing instruction meet the individual needs of adult learners who traditionally experience considerable difficulty in these areas. An integration of varied, interactive methodologies also provides the opportunity for the instructor to introduce important re-teaching exercises and to observe and evaluate students' mastery of targeted skills.

The evolutionary process of writing skills acquisition lends itself well to varied, interactive instruction. A combination of whole class, small group, and individual writing activities ensure that students' individual learning needs are attended to. For example, pre-writing activities such as brainstorming and clustering can be accomplished using a combination of these activities. Editing, proofing, and revision exercises lend themselves well to small group and peer tutoring situations. This kind of cooperative learning allows adult learners to benefit from one another's skills and expertise in the writing process.

Mathematics instruction must also recognize individual students' needs. For the JOBS participant, instruction is most successful when it includes real-life application. For example, instructors may want to capitalize on JOBS participants' need to budget and

manage their monthly public assistance benefits to emphasize the practical applications of mathematics. In addition to encouraging this kind of applicability, variety in instructional delivery takes into consideration the anxieties many adult learners experience with mathematics. Cooperative learning allows those students with well developed mathematics skills to serve as tutors to their peers. A number of approaches to instruction may prove successful when a student needs help getting started on an assignment or needs a demonstration of individual problem-solving skills. For example, problem-solving techniques may be introduced as group activities, monitored by the instructor and followed by practice in the self-directed format or with a peer.

Note: The features of instructional delivery discussed here are also addressed in the TEA **Making A Difference** video tape and materials training packet available through the Division of Adult and Community Education Program Development.

Educational Activities

Adult education cooperatives can expect to receive JOBS referrals to four kinds of educational activities: beginning Adult Basic Education, intermediate Adult Basic Education, Adult Secondary Education possibly leading to a certificate of General Educational Development (GED), and English as a Second Language. The educational component of the JOBS program is intended to provide the instruction necessary for the participant to achieve a proficiency level consistent with the participant's employability plan. Some JOBS participants will need to be enrolled in several educational activities before achieving the desired or necessary proficiency level. Contractual responsibilities cease upon completion of the educational component or components or when the JOBS participant can no longer be satisfactorily served by the adult education cooperative.

With JOBS participants, as with all adult learners, it is important to recognize and to capitalize upon the significant value of varied life experiences and skills that they bring into the classroom. A **whole language approach** to the teaching of oral and written language skills is an excellent choice when working with adult learners, whether they are enrolled in adult basic education, adult secondary education, English as a Second Language, or job training. Whole language instruction is easy to recognize but difficult to define. It involves a holistic approach to teaching and learning, building oral and written language skills development around the experiences, knowledge, and motivations of learners. Skills are related to real-life needs and concerns, not taught in isolation. Mathematics, problem-solving, and decision-making skills can be built into whole language instruction, enabling learners to develop an integrated set of skills which allow them to take more control over their own lives as learners, parents, workers, and citizens.

Teaching skills in isolation slows down the learning process and discourages students from applying critical thinking skills across the curriculum and to real-life situations. Because time constraints demand that several skills be taught concurrently, the whole language approach to instruction is especially appropriate for the JOBS participant. A whole language program integrates reading, writing, listening, and speaking in a natural language learning environment, regardless of the content area. For example, instructors help students see the natural linkages between mathematics and reading or between reading and writing. Students exposed to the whole language approach appear to enjoy greater success in learning to transfer skills learned in one content area to others, and from the classroom to real-life applications. Activities and strategies consistent with the whole language approach to instruction include the following:

- regular and frequent practice and application of skills across the curriculum;

- use of high interest, level-appropriate materials and subject matter;
- awareness that learning to read, write, and problem solve are all multi-step processes;
- instructional activities that the student perceives as valuable and relevant to daily life;
- early introduction to and frequent practice in using higher order thinking skills of comprehension, application, analysis, and evaluation; and
- opportunities for cooperative learning through group discussion, group writing, peer tutoring, and cooperative problem solving.

Affective as well as cognitive needs can have a significant impact on participants' attendance, their ability to concentrate, and academic progress necessary for success. Instruction must address JOBS participants' need to strengthen life coping skills that encourage self-sufficiency and a strong commitment to the education process. A curriculum that integrates the learning of life coping skills and academic skills is essential to educational programs for JOBS participants.

So as not to compound an already strong fear of failure and impose still another barrier to educational success, special attention must be given to structuring learning experiences to ensure success and minimize failure. Adult learners whose academic skills fall at the lower end of the proficiency scale usually perform better in a less independent learning environment than those students whose proficiencies are considerably higher. The fragility of their skills requires an atmosphere of respect and trust, coupled with opportunities to apply newly acquired skills. A carefully controlled format, coupled with consistent supervision at this level, provides the adult learner with an educational setting in which to internalize these new skills.

Instructors who use personalized study plans have found that adult learners are able to gradually increase the self-directed components of their studies and consequently manage more complex tasks as they move up the scale toward greater self-sufficiency. Self-directed educational activities assist individuals in becoming effective learners and at the same time reinforce independence, enhance self-esteem, and build trust - all important skills for JOBS participants.

Assessing JOBS participants' readiness to proceed in one of the four kinds of educational activities is the responsibility of the adult education cooperative. Placement in one of these educational activities and identification by the corresponding two-digit code is to be determined by initial assessment.

Basic and Remedial Instruction

The terms of the interagency cooperation contract specify that adult education cooperatives are to provide basic and remedial instruction (ABE) necessary for a JOBS participant to achieve a literacy level consistent with the participant's employability plan. The educational activity for these participants is to be identified on the *JOBS Weekly Attendance Verification* form (TDHS Form 2736 - see Appendix B) as Beginning Adult Basic Education (Code 01) or Intermediate Adult Basic Education (Code 02) as defined by federal regulations.

The majority of JOBS participants identified as Service Level III and a large number of participants in the Service Level II category will require adult basic and remedial instruction

at levels 0 - 8.9. In addition, some Service Level I participants who already have a high school diploma or equivalent may be referred to this educational activity to upgrade reading or math skills for an employment training program. While a GED certificate is a goal for many JOBS participants, other participants may only be required or be able to upgrade their basic skills to a level consistent with the employability opportunities in the local market. Others, because of severe educational deficiencies, learning difficulties, or personal barriers may best be served by an upgrade in basic skills and an introduction to job readiness and life planning skills.

Please note: A change in the two-digit code is necessary when a JOBS participant moves from beginning ABE to intermediate ABE studies. Therefore, **ongoing assessment** is crucial to determine a JOBS participant's readiness to move from one educational activity to another.

ABE students, whether beginning or intermediate, are more successful when they are involved in planning their instruction. Involvement in the planning process from the very beginning may help them keep the long term commitment required of them if they are to pursue a GED certificate. However, for students demonstrating proficiencies at the ABE levels, skills development is probably most rapid when educational tasks allow development in small, sequential increments.

Advanced Secondary and GED Instruction

The interagency contract further states that adult education cooperatives shall provide instruction that can lead to GED certification and advanced secondary instruction necessary for a JOBS participant to achieve a literacy level consistent with the participant's employability plan.

Many JOBS-participants classified as Service Level II participants are referred to adult education cooperatives for this educational activity. The educational activity for these participants is to be identified as Code 03 on the ***JOBS Weekly Attendance Verification*** form.

Assessment will be necessary to verify an individual's proficiency level, GED readiness, and appropriate placement in this or another educational activity. The ABE Screening scores in reading and problem-solving, as indicated by case management on the ***JOBS Education Service Provider Referral*** form, may be insufficient in determining an individual's readiness for GED preparation. Accurate assessment of the JOBS participant's academic proficiencies, as well as an honest portrayal of short and long term goals and expectations, should be communicated to both the student and case management personnel.

JOBS participants enrolled in GED and advanced secondary instruction may feel more pressure than other JOBS participants to succeed academically because entry into a job training program may be contingent upon their obtaining GED certification. While much of the instructional focus at this level is on the GED test itself, deficiencies in GED readiness must be identified as early as possible. Instruction should also include the development and refinement of skills such as life coping skills, pre-employment skills, and job readiness skills. The acquisition of these skills is essential to the students' future success in the world of work.

Special efforts must be made to capitalize on the learner's already established proficiencies. Again, the **whole language approach** to instruction will help this group of learners to maximize the effectiveness of their instructional time in the classroom and develop critical thinking skills that will serve them well in the work place.

English as a Second Language

In accordance with the contract, the adult education cooperative is to provide instruction in English as a Second Language (ESL) where assessment indicates that language training is necessary for the JOBS participant to meet the objectives of the participant's employability plan.

Educational needs for JOBS participants with limited English proficiency are generally long-term and extensive. The ESL educational activities for these participants are to be identified as **Code 04** on the *JOBS Weekly Attendance Verification* form. Although TDHS does not differentiate between the various levels of ESL proficiency, assessment is crucial to ensure proper placement in ESL educational activities.

In some locations, instruction in English as a Second Language will be necessary in order for the JOBS participant to compete in the local job market. In those regions where TDHS has referred JOBS participants needing ESL instruction to the adult education cooperatives, most of these participants are likely to be identified as Service Level III clients. Many of these individuals may have limited or no work history and no vocational skills or training. Many will not have completed the 8th grade and may have multiple barriers to self-sufficiency.

Complex concepts easily understood in a learner's first language may present unmanageable obstacles in the context of English language acquisition. In serving JOBS participants who are ESL students, there is a need for careful control of instruction and supervision of learning activities to prevent learners from becoming overwhelmed before having the opportunity to internalize the learning. Crucial to beginning ESL instruction are structured learning experiences that ensure a significant degree of early success, supported by the instructor's encouragement and assurance of the student's ability to learn.

Because higher order thinking skills build on simpler component skills, students are most successful when educational activities related to higher order thinking skills are planned and introduced to students functioning at the lowest proficiency levels and then gradually expanded as proficiency increases. As with ABE and GED students, instructors have the responsibility for ensuring that 1) the student is involved in the instructional process, and 2) learning activities integrate and reinforce as many skills as possible as the learner advances to the intermediate and advanced levels of English language proficiency. Again, the **whole language approach** to instruction effectively addresses these essentials of instructional delivery. It is also recommended that the development of life coping skills, pre-employment skills, and job readiness skills be integrated with ESL instruction to ensure a student's potential for success.

Ancillary Services

As stated in the contract, JOBS participants may receive ancillary services such as counseling and instruction in life coping skills, pre-vocational planning, job readiness training, and other forms of pre-employment preparation where such services are a standard part of an educational program provided by an adult education cooperative.

A curriculum that integrates life coping skills and basic skills is currently being developed through a special project. This curriculum will include literacy skills and behaviors prerequisite to successful employment, economic independence, and personal effectiveness. The Texas Education Agency will disseminate the curriculum and implementation specifics, including teacher training, to adult education cooperatives statewide when the product is complete.

Other ancillary services that would enhance educational programs for JOBS participants may be available in adult education cooperatives which receive funds from other sources such as the Job Training and Partnership Act. Services may include the following:

- career interest inventories;
- local job market information;
- assistance with the completion of job applications;
- resume writing;
- computer literacy; and
- word processing.

Attendance Verification

As per the contract, adult education cooperatives are responsible for providing weekly attendance information regarding the JOBS participant's attendance and progress to a designated TDHS contact person, using the *JOBS Weekly Attendance Verification* form (TDHS Form 2736 - see Appendix B).

JOBS activities may be a combination of activities that include education, job skills training, job readiness activities, and job development and placement. But many JOBS participants will require intensive educational remediation prior to job skills training or job placement. The case manager initiates referrals to education and job training programs and usually has the most comprehensive understanding of the JOBS participant's overall needs for support services, education, and training.

Because JOBS participants' educational needs are great, regular and frequent attendance is crucial to participants' success in educational programs. Adult education cooperatives are encouraged to provide a minimum of 20 hours of instruction per week. In serving JOBS participants who may be simultaneously enrolled in more than one JOBS activity, fewer hours of instruction may be required. Adult education cooperatives are encouraged to maintain communication with case management personnel as to the resource limitations of adult education programs that can be offered.

The clear guidance of the Family Support Act is that participation in JOBS activities should be significant and not be permitted to become a token effort. Classroom instruction, including small group and self-directed learning activities, may be supplemented by computer-assisted instruction as well as multi-media instructional activities in an effort to provide the needed hours of participation.

Reporting Weekly Attendance

Reports of weekly attendance and progress provided by adult education personnel to designated TDHS personnel are crucial to effective program management. **Timely reporting of attendance and progress is essential** in order to alert case management personnel to participants' academic status and attendance patterns. Case management personnel can only intervene if informed of JOBS participants' absenteeism or lack of progress.

Completed *JOBS Weekly Attendance Verification* forms, submitted to TDHS on a timely basis, with a copy to be retained by the adult education cooperative, provide accurate documentation of attendance that meets federal requirements and that supports active program management. Telephone conversations, while helpful in maintaining

coordination and communication between contract partners, are inadequate substitutes for weekly written attendance reports. While TDHS is only required to aggregate attendance figures on a monthly basis, sound and effective instructional practices call for frequent and timely reporting of attendance and academic progress.

JOBS participants are expected to attend at least 75 percent of the total number of hours of instruction scheduled and must be found to be satisfactorily participating or making satisfactory progress. The attendance verification form, field tested by a number of adult education cooperatives prior to official program implementation, communicates maximum information about participants' attendance and progress but minimizes recordkeeping. The following information constitutes a complete weekly attendance report:

- name of institution or facility;
- course name (educational activity or activities);
- class site location;
- name of instructor;
- total number of instructional hours scheduled;
- weekly beginning and ending dates;
- clients' names and identification numbers (provided on TDHS form 2735);
- educational activities in which clients are enrolled (identified by two-digit codes);
- satisfactory progress (alerting case management to unsatisfactory status);
- number of hours per week attended by clients; and
- instructor comments, signature, and date.

Note: the space for course name may be left blank if clients listed on the attendance verification form are enrolled in a variety of educational activities (for example, ABE and GED) and the two-digit codes are used to identify these activities. However, if all clients listed on an attendance verification form are enrolled in a single educational activity, cooperative personnel may save time by placing the activity's two-digit code in the space for course name.

Instructors are responsible for changing the two-digit code identifying the educational activity in which a JOBS participant is enrolled as the student moves from one educational activity to another. For example, the two-digit code for a student enrolled in intermediate ABE studies, Code 02, will change to a Code 03 upon the student's transition into GED level studies.

To avoid having to recopy participants' names and client numbers each week, as well as other information that does not change on a weekly basis, adult cooperatives may make multiple copies of this attendance roster, entering only the necessary changes in educational level of activity or additions and deletions to the student roll. The date and instructor's signature, however, must be original.

Before making any modifications to the attendance verification process, adult education cooperative personnel are responsible for coordinating with local TDHS personnel as well

as with TEA adult education staff to ensure that such modifications do not interfere with the transmittal of information vital to tracking and documentation procedures.

Cooperatives already using the form report success with a number of innovative arrangements used to transmit attendance data. In large cooperatives where numerous sites are serving JOBS participants, instructors are mailing forms directly to the TDHS designee each Friday, retaining a copy for cooperative records. In other cooperatives, the TDHS designees are picking up the attendance forms each Friday. In a few cooperatives, adult education personnel are delivering the attendance forms to the TDHS designees at the end of each week.

Note: It is recommended that adult education cooperatives transmit attendance information to a single designated TDHS contact rather than every case manager. This minimizes the clerical efforts required of the cooperative and helps avoid duplication of effort. Coordination at the local level is necessary to ensure that cooperative personnel are using the most efficient method of reporting weekly attendance.

Reporting Student Progress

The column set aside to indicate satisfactory progress can be used as an efficient means of documenting an instructor's concern about a JOBS participant's status. Consistent use of this column serves as a means of alerting case managers to a participant's attendance and performance patterns. Only through timely reporting of a participant's attendance and academic status can case management personnel intervene and provide the support needed by both the participant and the education service provider.

Location and Coordination

Easy access to year-round educational activities is a major concern for JOBS participants. The lack of adequate transportation severely hampers many participants' capacity to participate in the JOBS program. Likewise, JOBS participants who cannot access year-round educational activities face major obstacles to successful participation in the JOBS program. Coordination between the adult education cooperative and local TDHS personnel is essential to ensure accessible educational services. The successful implementation of the JOBS program as a whole depends largely on efforts to coordinate services.

Location of Classes

Location of class sites can have a significant impact on JOBS participants' attendance. A number of adult education cooperatives have witnessed a noticeable improvement in attendance and retention rates at class sites located in participants' neighborhood communities and AFDC offices. Location near the participants' homes or in facilities provided by TDHS usually means less travel for participants and contributes to the concept of one-stop shopping for multiple services required by JOBS participants. While co-location at AFDC facilities is not always possible, a number of AFDC offices have been able to make space available upon request.

Interagency Coordination

Coordination at the local level among TDHS staff, adult education cooperative personnel, and other service providers is crucial to the success of the JOBS program. To maximize the use of resources available to serve the target population, several recommendations for successful coordination have been presented by cooperative personnel.

- Conduct joint planning sessions at the local level on a regular basis. These enable both TDHS and adult education personnel to evaluate local

arrangements and make informed decisions about needed changes in the delivery of educational services.

- Maintain open lines of communication with TDHS staff regarding changes in JOBS participants' status. TDHS Form 2736 is a quick, efficient means of documenting actual number of hours of instruction attended and whether participants are making satisfactory progress. Use of this form alerts case management to concerns about participants' performance.
- Request consistent use by case management of TDHS Form 2735 to refer all JOBS participants, regardless of service level, to adult education cooperative programs. This is the only official means of documenting the cooperative's delivery of educational services to JOBS participants.
- Include TDHS personnel in staff development sessions whenever possible. Likewise, take advantage of opportunities for cross training with TDHS.
- Invite TDHS staff to visit class sites and to attend special functions. The more familiar they are with adult education programs, the better prepared they are to support adult educators' efforts to serve JOBS participants.

Technical assistance with instructional program development is available to adult education cooperatives through the Texas Education Agency, Division of Adult and Community Education Program Development.

FISCAL POLICIES

The interagency cooperation contract between TDHS and TEA delineates procedures for calculating and requesting reimbursement for educational services provided to JOBS participants. The contract specifically states:

The basis of payment shall be a monthly amount necessary to cover the operating costs of the program with quarterly reconciliation to actual cost, in accordance with procedures normally used by TEA for similar programs. Allowable costs are to be determined in accordance with the Family Support Act of 1988 and all applicable state and federal regulations promulgated thereunder.

TDHS shall pay for services received from appropriation items or accounts from which expenditures would normally be paid, based upon vouchers drawn by TDHS and payable to TEA. Payments for services performed shall be billed monthly. Payments received by TEA shall be credited to its current appropriation item(s) or account(s) from which the expenditures of that character were originally made.

In serving the educational needs of JOBS participants, the fiscal agent should use the comprehensive delivery system already established through the adult education cooperative. Existing policies and rules governing the administration of adult education programs still apply, with some exceptions. Examples follow.

- The basis for funding educational services to AFDC / JOBS participants is not contingent upon the number of contact hours generated during the previous year as it is with other ABE programs. Allocations of AFDC funds have been based on the number of potential AFDC clients in each JOBS county served by respective adult education cooperatives.
- Numbers of hours generated in classes which are 100% AFDC funded may not be counted in the regular adult education program contact hour totals.
- No tuition or fees shall be charged to JOBS participants who are enrolled in adult basic, adult secondary / GED, or ESL instruction.
- There are no restrictions on the percentage of federal funds that may be expended for instruction of JOBS participants in secondary education and GED preparation (grade equivalent levels 9-12).
- The requirement to expend at least 10 percent of available federal adult education funds for the institutionalized is not applicable to JOBS programs.

Funding Restrictions

As a specific provision of the interagency cooperation contract, TDHS requires the performing agency (TEA) to certify that the educational services to be provided to AFDC recipients are not otherwise available on a non-reimbursable basis. This provision, as it applies to adult education programs already available in the cooperatives, is discussed in detail on page 42194 of 45 CFR, part 205, under the section entitled, Maintenance of Effort. The regulatory requirement covered under section 250.72 (d) requires "that providers under contract or agreement with TDHS certify that the services being provided with JOBS funds are not services that would have been available to AFDC applicants or recipients under a program already providing general services to the community, including AFDC recipients."

A state GED program can be used as an example. The regulation states, "In this instance, JOBS funds would be available for the cost of a GED program established for AFDC recipients specifically for the purposes of the JOBS program which is in addition to the GED programs provided to the general community." The regulation also states, "...special circumstances such as the need for more intensive training might warrant additional or separate JOBS funding... The essential test is that JOBS funding not be used to supplant services which the state would otherwise provide through other arrangements and sources of funds."

The provision discussed above may appear to restrict AFDC clients to ABE classes which have available space and implies that ABE funds must then be used to pay for AFDC related services. The following scenarios illustrate some situations in which this restriction may not apply.

1. When sufficient numbers of AFDC clients require extensive and/or specialized instruction or support services, separate classes must be established to meet their special needs. Some adult education programs may not have funds to provide special services such as pre-vocational activities. In such situations, services provided, including the salaries of those providing the special service, may be charged to AFDC funding.

2. Twenty hours per week of educational activities and the need for intensive instructional services for JOBS clients seriously impacts many adult education cooperatives whose regular state and federal adult education funding typically allows only parttime programming. If additional hours per week above the standard hours per week offered in adult education programs are needed to assure progress for JOBS clients, these services may be paid for with JOBS funds.
3. If the requirement for both day and night classes (day classes for JOBS clients and night classes for regular adult education students) makes unreasonable demands on adult education funding resources, these needs may be characterized as special needs of JOBS clients. If, for example, the majority of adult education funded classes convene during the evening hours and there is a legitimate requirement for day classes for JOBS clients, then JOBS funds may be targeted.
4. The adult learning center may be the most efficient means of serving adult learners with a variety of attendance requirements. A common denominator in many successful learning centers is computer-assisted instruction. Computer-assisted instruction (CAI) may provide one way for adult education programs to supplement classroom instruction and meet the 20-hours per week standard for JOBS clients. The purchase of CAI resources and the services of instructional staff to coordinate their use may be charged to AFDC funding when their acquisition helps JOBS participants meet attendance requirements.

Regardless of the funding sources involved, all hours of educational activity accumulated by each JOBS participant must be accounted for and reported regularly on the Weekly Attendance Verification Form.

The requirement of adult education cooperatives to establish and maintain extensive and timely attendance and progress reporting to TDHS may also be regarded as a special need beyond that required of other state and federally funded programs. In this case, it would be appropriate to use JOBS funds to purchase the equipment, special supplies or services needed to meet the increased reporting and record-keeping requirements. Instructional aides may be employed to handle increased recordkeeping and reporting requirements; however, when employing additional clerical staff to deal with the increased reporting and record-keeping requirements, administrative cost limits remain in effect. Questions concerning specific uses of AFDC funds should be directed to the Division of Adult Education, Employment and Training, Funding and Compliance.

Quarterly and Final Reimbursements

Notification of approval of the application is made by a Notice of Grant Award mailed to the fiscal agent by the Texas Education Agency. An initial advance payment will be processed when the SAS 301 is approved. Additional payments are processed upon receipt of the quarterly expenditure report.

Quarterly and final expenditure reports are required for AFDC claims according to the following schedule:

Expenditures through 12-31-9_: Quarterly report due 01-15-9_
 Expenditures through 03-31-9_: Quarterly report due 04-15-9_
 Expenditures through 06-30-9_: Quarterly report due 07-15-9_
 Expenditures through 08-31-9_: Final report due 10-15-9_

Specific guidelines for completing the AFDC portion of the Report of Project Expenditures and Cash Requirements (Adult Education SAS-314A) are included in the instructions which accompany the SAS-314 A. Please note the requirement at the bottom of those instructions to provide the number of AFDC recipients for which services were provided and for which reimbursement is claimed.

In order to ensure timely reimbursements for educational services rendered, each adult education cooperative should establish an efficient system for forwarding accurate statistical information to TEA. This information will include numbers of JOBS clients referred by TDHS and subsequently enrolled in educational activities as well as reliable attendance records and quarterly expenditure reports. It is essential that each cooperative director establish close coordination with local TDHS representatives to ensure that the cooperative receives the official means of referral, the *JOBS Education Service Provider Referral* form (TDHS Form 2735 - see Appendix A). In order to assist TDHS in meeting federal reporting guidelines, additional agreements may be made which facilitate the maintenance and submission of the *JOBS Weekly Attendance Verification Form* (TDHS Form 2736 - see Appendix B), thereby enabling TDHS case management personnel to intervene in a timely fashion on behalf of the JOBS participant.

Program Accountability

Compliance Monitoring. TEA will review educational services to JOBS participants through a system of on-site compliance monitoring and technical assistance visits conducted by representatives of the Division of Adult and Community Education Program Development and the Division of Adult Education, Employment and Training, Funding and Compliance.

Annual Performance Report. Adult education cooperatives may use the Annual Performance Report forms (AET 068) to report demographic and other required AFDC / JOBS participant information. The AFDC annual performance report is in addition to those required for other adult education programs and is due to the TEA 45 days from the ending project date.

JOBS EDUCATION SERVICE PROVIDER REFERRAL

IDENTIFYING INFORMATION

Participant Name (First, MI, Last)	Client No.	Social Security No.	Date of Birth
Address			Telephone No.
Participant's Service Level ☐ I ☐ II ☐ III	Participant's School District (current residence)		

REFERRAL INFORMATION

Referred To (institution or facility)			Date of Referral	
ABLE Test Date	Raw Reading Score:	Raw Problem Solving Score:	Completed Survival Skills ☐ Yes ☐ No	
Name of School Attended	Address/Location of School		Highest Grade Completed	Last Date Attended
Person Making Referral		Agency Name		
Agency Address			Telephone No.	

Comments: _____

Signature—Person Making Referral

Date

PROVIDER INFORMATION (Educational Resource Representative to Complete This Section)

Activity Enrolled In	Enrollment Date
Teacher/Instructor	Telephone No.
Reason Not Enrolled	

Comments: _____

Signature—Teacher/Instructor

Date

**JOBS WEEKLY ATTENDANCE VERIFICATION
ADULT EDUCATION PROVIDER**

Institution/Facility Name	Course Name	Scheduled Hours	
Teacher/Instructor	Class Site Location	Week Beginning (date)	Week Ending (date)

I certify that the individuals listed below have attended class during the hours indicated for this week:

PARTICIPANT NAME (Last, First, MI)	CLIENT NO.	EDUC. LEVEL	SATISFACTORY PROGRESS		NUMBER HOURS ATTENDED
			Yes	No*	
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					

* Teacher/instructor will be contacted for consultation about participant's unsatisfactory progress.

Teacher/Instructor Comments: _____

ORIGINAL to be mailed to DHS Contact Person
COPY to be filed by Teacher/Instructor

Signature—Teacher/Instructor

Date

COMPLIANCE STATEMENT

TITLE VI, CIVIL RIGHTS ACT OF 1964; THE MODIFIED COURT ORDER, CIVIL ACTION 5281, FEDERAL DISTRICT COURT, EASTERN DISTRICT OF TEXAS, TYLER DIVISION

Reviews of local education agencies pertaining to compliance with Title VI Civil Rights Act of 1964 and with specific requirements of the Modified Court Order, Civil Action No. 5281, Federal District Court, Eastern District of Texas, Tyler Division are conducted periodically by staff representatives of the Texas Education Agency. These reviews cover at least the following policies and practices:

- (1) acceptance policies on student transfers from other school districts;
- (2) operation of school bus routes or runs on a non-segregated basis;
- (3) nondiscrimination in extracurricular activities and the use of school facilities;
- (4) nondiscriminatory practices in the hiring, assigning, promoting, paying, demoting, reassigning, or dismissing of faculty and staff members who work with children;
- (5) enrollment and assignment of students without discrimination on the basis of race, color, or national origin;
- (6) nondiscriminatory practices relating to the use of a student's first language; and
- (7) evidence of published procedures for hearing complaints and grievances.

In addition to conducting reviews, the Texas Education Agency staff representatives check complaints of discrimination made by a citizen or citizens residing in a school district where it is alleged discriminatory practices have occurred or are occurring.

Where a violation of Title VI of the Civil Rights Act is found, the findings are reported to the Office for Civil Rights, U.S. Department of Education.

If there is a direct violation of the Court Order in Civil Action No. 5281 that cannot be cleared through negotiation, the sanctions required by the Court Order are applied.

TITLE VII, CIVIL RIGHTS ACT OF 1964; EXECUTIVE ORDERS 11246 AND 11375; TITLE IX, 1973 EDUCATION AMENDMENTS; REHABILITATION ACT OF 1973 AS AMENDED; 1974 AMENDMENTS TO THE WAGE-HOUR LAW EXPANDING THE AGE DISCRIMINATION IN EMPLOYMENT ACT OF 1967; AND VIETNAM ERA VETERANS READJUSTMENT ASSISTANCE ACT OF 1972 AS AMENDED IN 1974.

It is the policy of the Texas Education Agency to comply fully with the nondiscrimination provisions of all federal and state laws and regulations by assuring that no person shall be excluded from consideration for recruitment, selection, appointment, training, promotion, retention, or any other personnel action, or be denied any benefits or participation in any programs or activities which it operates on the grounds of race, religion, color, national origin, sex, handicap, age, or veteran status (except where age, sex, or handicap constitute a bona fide occupational qualification necessary to proper and efficient administration). The Texas Education Agency makes positive efforts to employ and advance in employment all protected groups.



TEXAS EDUCATION
Austin, Texas
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